



Genova Burns LLC
494 Broad Street, Newark, NJ 07102
Tel: 973.533.0777 Fax: 973.533.1112
Web: www.genovaburns.com

Christopher Zamlout, Esq.
Member of the NJ and NY Bar
czamlout@genovaburns.com
Direct: 973.535.4444

March 16, 2021

VIA ELECTRONIC FILING

Honorable Tonianne J. Bongiovanni, U.S.M.J.
United States District Court
District of New Jersey
402 East State Street
Trenton, New Jersey 08608

Re: Todd Stathum v. Barry Nadrowski, et al.
Docket Number: 3:15-cv-05502

Dear Judge Bongiovanni:

As Your Honor is aware, the Court appointed this office as pro bono counsel for plaintiff, Todd Stathum ("Plaintiff"), in the above-referenced matter. Pursuant to the January 28, 2021 case management conference, we write to provide an update on discovery. First, as represented during the conference, our office has received the necessary documents from Plaintiff to respond to written discovery demands. However, that process requires us to review said documents with our client, which has delayed our responses. Counsel for both parties shall be providing responses to written discovery in short order.

Next, Your Honor inquired as to the ability to conduct Plaintiff's deposition. We have been advised that the facility is equipped with video teleconferencing capabilities which can be utilized for Plaintiff's deposition. The facility has requested advanced notice and represented that there may be certain limitations as to the dates Plaintiff can be made available and the length of time he may be available. These limitations have been relayed to opposing counsel and the parties shall coordinate to conduct Plaintiff's deposition on a mutually available date, with an agreement to conduct same in the next two months, barring any unforeseen issues.

Should the Court have any questions, please feel free to contact me. In addition, if the Court would like to set a case management conference to discuss this matter, we would be happy to participate and provide more detail as needed. Thank you for Your Honor's attention to this matter.



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Respectfully submitted,

GENOVA BURNS LLC

/s/ Christopher Zamlout
CHRISTOPHER ZAMLOUT

CZ:jjr

c: All Counsel of Record (via electronic filing)

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